



165524  
"LIGHT, D MICHAEL" <DMLIGH@solutia.com> on 04/30/2001 09:40:00 AM

To: MICHAEL MCATEER  
Subject: Sauget Area 1 - EECA & RIFS Draft Report Revisions

Mike,

Based on the outcome of the April 18, 2001 EECA / RIFS Report review meeting with USEPA, IEPA, USEFWS, USACE and Adrian Brown Consulting, attached is a summary of Solutia's understanding of the changes that USEPA would require to the draft March 9, 2001 EECA / RIFS report for Sauget Area I before Agencies' approval would be granted. Solutia is currently in the process of revising the report in accordance with this understanding and will, as agreed, submit the revised draft EECA / RIFS Report by June 1, 2001. I offer this summary for your early review so that if we have misinterpreted any basic positions and concerns of the Agencies, that you would have the opportunity to inform us in time to resolve the issue prior to the deliverable date. As we stated at the April 18 meeting, Solutia's goal remains delivery of an approvable document to the Agencies on June 1.

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Summarizing the alternatives to be evaluated in the revised draft EECA / RIFS Report:

EECA (Waste, Soil, Sediment, Surface Water and Air)

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|---------------|---|
| Alternative A | Institutional Controls<br>Groundwater Monitoring  |
| Alternative B | Institutional Controls<br>Groundwater Monitoring<br>Pooled DNAPL Recovery   |
| Alternative C | Institutional Controls<br>Groundwater Monitoring<br>Pooled DNAPL Recovery<br>Impermeable Caps on Sites<br>G, H, I and L   |
| Alternative D | Institutional Controls<br>Groundwater Monitoring<br>Pooled DNAPL Recovery<br>Source Stabilization<br>In-Situ Mixing of 10, 20, 30, 40 & 50% of<br>waste material Impermeable Caps on<br>Sites G, H, I and L   |
| Alternative E | Institutional Controls<br>Groundwater Monitoring<br>Pooled DNAPL Recovery<br>Source Removal<br>Excavation of 10, 20, 30, 40 & 50% of waste material and<br>on-site disposal<br>Excavation of 10, 20, 30, 40 & 50% of waste material and<br>off-site disposal at Lone Mountain, Oklahoma |

Leachate Recovery  
Pumping of leachate from the 50, 60, 70, 80 & 90% waste  
material not removed and treatment at American Bottoms  
Impermeable Caps on Sites G, H, I and L

RIFS (Groundwater)

Alternative A Institutional Controls  
Groundwater Monitoring

Alternative B Institutional Controls  
Groundwater Monitoring  
Hydraulic Barrier  
Downgradient of Site I

Alternative C Institutional Controls  
Groundwater Monitoring  
Hydraulic Barrier Downgradient of Site I Hydraulic Barrier  
Downgradient of Sites G, H and L

Alternative D Institutional Controls  
Groundwater Monitoring  
Aggressive Groundwater Recovery Downgradient of Site I and  
Sites G, H and L  
Aggressive DNAPL Recovery Downgradient of Site I and Sites G,  
H and L

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As you stated during the April 18 meeting, the Human Health (HHRA) and Ecological Risk Assessments (ERA) must be approved by the Agencies prior to final approval of the EECA - RIFS Report. It is Solutia's understanding that most issues have been resolved on the draft HHRA and that it is approvable with minor additional corrections. The Agency however is not satisfied with Solutia's Response to Comments document on the ERA. Solutia and our consultants (Menzie Cura) will be working with the Agencies and its consultants in the interim to revise the ERA as necessary to obtain Agency approval.

If you have any concerns with this summary and plans for revising the EECA - RIFS Report, please call and discuss.

Thanks,  
Mike Light



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